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November 29, 2021

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: **Fredly, et al. v. Sino Agro Food, Inc., et al., No. 1:19-cv-2680-JMF**

Dear Judge Furman:

My firm represents Defendant Sino Agro Food, Inc. ("SIAF") in the above-referenced matter. I am writing to respectfully request an extension of time for Defendant to file its response to Plaintiffs' Motion to Appoint a Temporary Custodial Receiver (ECF #115) (the "Motion"). I have conferred with Plaintiffs' counsel, Angus Ni, about this request, and Plaintiffs consent to the request; Plaintiffs and SIAF have also agreed to an extension of time for Plaintiffs to file their reply papers. Accordingly, Plaintiffs and SIAF have agreed to the following briefing schedule on the Motion:

- Defendant's response to the Motion shall be due by no later than December 23, 2021. Defendant's response is currently due by no later than December 9, 2021 pursuant to the Court's Order dated November 19, 2021.
- Plaintiffs' reply on the Motion shall be due by no later than January 13, 2022. Plaintiffs' reply would otherwise be due no later than seven days after the filing of Defendant's response.

This is the first request for an extension on the Motion. Defendant requests the extension because my firm was retained in this matter shortly before Thanksgiving and Defendant will require more time to respond to the Motion, which includes over 300 pages of supporting declarations and exhibits, and to gather its own supporting evidence. Additionally, Plaintiffs have requested additional time for their reply due to the intervening holidays.

The Honorable Jesse M. Furman
November 29, 2021
Page 2

Accordingly, the parties respectfully request that the Court grant the requested extensions and adopt the briefing schedule proposed above.

Respectfully Submitted,

/s/ Arthur Biller

Arthur Biller of
LEWIS BRISBOIS BISGAARD &
SMITH LLP

cc: All Counsel of Record

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 125.

SO ORDERED.



A handwritten signature in black ink, appearing to read "Arthur Biller".

November 30, 2021